



January 9, 2019

United States Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Attention: Mr. Wesley Hardegree
Environmental Engineer

Re: **Quarterly Progress Report #29 October-December 2019**
Bluestone Coke, LLC
3500 35th Avenue North
Birmingham, Jefferson County, Alabama
USEPA ID No. ALD 000 828 848
Terracon Project No. E1127096

Dear Mr. Hardegree:

On behalf of Bluestone Coke, LLC (Bluestone Coke), Terracon Consultants, Inc. (Terracon) has prepared Quarterly Progress Report #29 for the work completed from October 1, 2019 to December 31, 2019 for the above-referenced site. This progress report has been prepared in accordance with paragraph 53 of the Order on Consent with effective date of August 1, 2016.

PROGRESS REPORT (OCTOBER 1, 2019 THROUGH DECEMBER 31, 2019)

Corrective Measures Implementation

- The Environmental Covenant (EC) for SMAs 4 and 5 was recorded in Jefferson County, Alabama on October 28, 2019.
- On December 11, 2019, Bluestone Coke received a Comments on Financial Assurance (FA) Mechanism, SMA 5 – Former Pig Iron Foundry letter from the US EPA. The US EPA provided two comments on the FA Mechanism. Bluestone Coke is currently revising/updating the FA Mechanism.
- On December 18, 2019, Bluestone Coke received Final approval of Corrective Measures Implementation Work Plans (including cost estimates), SMA 4 – Former Chemical Plant letter from the US EPA. The letter requests the Bluestone Coke submit a FA mechanism for SMA 4 within sixty calendar days from receipt of the letter. The letter also requests that the Land Use Control Plans (LUCPs) for SMA 4 and SMA 5 be submitted within 120 calendar days from receipt of this letter.

Interim Measures

- Hydraulic Control System was running during this reporting period. The volume of water recovered from October 1, 2019 through December 31, 2019 was 433,350 gallons.
- Groundwater level measurements and groundwater samples were collected from the monitoring wells in November 2019. These results will be reported to EPA in the next Annual Report which is due by August 30, 2020.

PROJECTED WORK FOR NEXT REPORTING PERIOD (JANUARY 1, 2020 THROUGH MARCH 31, 2020)

Corrective Measures Implementation

We anticipate the following activities related to the approved CMI Work Plan to occur:

- Financial Assurance for the approved CMI Work Plan for SMAs 4 and 5 will be finalized by Bluestone Coke and submitted to EPA.
- Draft LUCP for SMA 4 and SMA 5 will be submitted to EPA.
- Initiation of Pilot Test.

Interim Measures/Remediating Monitoring

- Collect groundwater samples in February 2020.

CLOSING

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,



Terrell W. Rippstein, AL-PG#8

Principal Geologist

Cc: Meredith Anderson – EPA Region 4
Mr. Don Wiggins – Bluestone Coke
ADEM